

93RF7282

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# EG&G ROCKY FLATS

DIST.	LTR	ENC
BENEDETTI, R.L.	✓	
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.J.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, D.W.		
HANNI, B.J.		
HARMAN, L.K.		
HEALY, T.J.		
HEDAH, T.		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE, E.M.		
MANN, H.P.	X	
MARX, G.E.		
MCDONALD, M.M.		
McKENNA, F.G.		
MONTROSE, J.K.		
MORGAN, R.V.		
POTTER, G.L.		
PIZZUTO, V.M.		
RILEY, J.H.		
SANDLIN, N.B.		
SHEPLER, R.L.		
STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, E.R.		
WILKINSON, R.B.	X	
WILLIAMS, S. (ORC)		
WILSON, J.M.		
ZANE, J.O.		
McHugh, M.F.	✓	
BUSBY, W.S.	X	X
LAKE, D.Y.O.		
Peterman, B.D.	✓	
Hawk, R.C.	✓	
Mast, G.C.	✓	
Schubbe, D.L.	✓	
Anderson, G.H.	✓	
Spydlowski, T.	✓	
Kerman, R.	✓	
Levin, M.	✓	
Bates, M.	✓	
Lisaor, M.	✓	
Hutchins, N.	✓	
CORRES. CONTROL	X	X
ADMIN RECORD	X	X
TRAFFIC		
Schwartz, T.	✓	

EG&G ROCKY FLATS, INC.  
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June 14, 1993

93-RF-7282

J. K. Hartman  
Assistant Manager  
Transition and Environmental Management  
DOE, RFO

TRANSMITTAL OF DRAFT STANDARD OPERATING PROCEDURES (SOPs) AND  
RESPONSE TO QUESTIONS RAISED IN EXTENSION REQUEST RESPONSE DATED  
JUNE 7, 1993 (06417) - RLB-282-93

Enclosed are the following Draft Standard Operating Procedures (SOPs) for your  
consideration per your above referenced memorandum:

- Surface Soil Sampling
- Tank and Pipeline Investigation
- Analysis of Environmental Water and Soil Samples by Gamma Spectroscopy
- Receipt, Storage and Preparation of Soil Samples for Gamma Spectrometric Analysis

These draft SOPs are undergoing EG&G internal review concurrent with the Department of  
Energy/Rocky Flats Office (DOE/RFO).

EG&G prepared the above draft procedures to cover the following list of topics that the  
DOE/RFO requested:

- Vertical Soil Profiles for the high purity germanium (HPGe) detector
- Collection of Surficial Soil Samples (per Technical Memorandum No. 5 for Operable Unit No. 1 [OU1])
- Collection of Surficial Soil Samples Below Paved Areas
- Soil Coring from Five Foot Depth to Confirm Soil Gas Surveys
- Use of Colorimetric Techniques to Determine Concentrations of Inorganic Parameters in Water
- Tank/Pipeline Inspection
- Tank/Pipeline Testing
- Tank/Pipeline Residue Sampling
- Collection of Surficial Soils (Root Zone) for Use in the Ecological Risk Assessment Process
- Collection of Wipe and Pavement Samples for polychlorinated biphenyl (PCBs)
- Steam Rinsate Sampling for Characterization in OU15
- Asphalt Sampling
- Laboratory Application of the HPGe

## CLASSIFICATION

UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER  
SIGNATURE

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER

DATE CLASSIFICATION OFFICE

IN REPLY TO RFP CC NO:

2459-RF-93

ACTION ITEM STATUS

☐ OPEN ☒ CLOSED

☐ PARTIAL

LTR APPROVALS:

WSB - *[Signature]*

ORIG & TYPIST INITIALS

mfm/ *[Signature]*

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. T. Ostdiek <i>[Signature]</i>
DATE	8-9-93

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All of the above topics were included in the enclosed SOPs except those which already exist, or which are not required per approved amendments (Technical Memoranda) to existing Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) Work Plans. A more complete discussion of the disposition of each of the topics listed above is enclosed (Enclosure #1).

A new Rocky Flats Plant SOP format has been developed but not yet been approved by the regulatory agencies. Therefore these SOPs are presented in the old format. These SOPs will be reformatted to the new RFP standard when regulatory approval of the new format is received. Questions or comments regarding these SOPs should be directed to M. F. McHugh of my staff. He can be reached at 966-8624. It is essential that comments made by your staff are delivered to EG&G by Friday, June 18, 1993, to allow sufficient time to complete revisions prior to the transmittal to the regulatory agencies on June 22, 1993, per your letter to Martin Hestmark and Gary Baughman dated June 7, 1993 (06418).

As requested in DOE memorandum 06417 dated June 7, 1993, a detailed accounting of the delays that led to our extension request of May 3, 1993 (EG&G Memorandum RLB-204-93) follows:

The development of these SOPs was included in the scope of work for the subcontract for implementation of field work for the Integrated Industrial Area OUs. Originally the subcontract award date was scheduled for April 14, 1993. This date was extended by Remediation Project Management (RPM) to April 30, 1993, to allow the subcontractor additional time to prepare their proposal. Similarly, the Technical Evaluation of the subcontractor's proposal was due to EG&G Procurement on April 9, 1993, but because of the complexity of the proposal, additional time was needed. The Technical Evaluation was completed by RPM on April 21, 1993. During development of the cost evaluations, EG&G Procurement had additional comments regarding RPM's technical evaluation. In response to Procurement's comments, RPM submitted an addendum to the Technical Evaluation on May 6, 1993. Since the Technical Evaluation process took longer than originally scheduled, EG&G Procurement could not meet the contract award date of April 30, 1993. To prevent further delay, a letter subcontract was issued on May 13, 1993, to the subcontractor. This letter subcontract allowed work to be performed regarding the development of planning documents and to initiate the training of personnel. This included the development of the SOPs. Currently EG&G Procurement is completing their negotiation plan and the subcontract is scheduled for negotiations and award during the week of June 21, 1993.

We were also requested to provide information regarding any field work that had been conducted using SOPs that were not approved by DOE, the Environmental Protection Agency (EPA) or the Colorado Department of Health (CDH) and that we inform you of any delays that have resulted or will result from SOPs not being approved.

In the past, work activities at OUs 1, 2, 3, and 5 were performed to unapproved draft SOPs at the verbal guidance of DOE. These approvals were documented in the weekly highlights. However, all of the related field work conformed to the SOPs as they were subsequently approved by DOE, EPA and CDH. No data acceptance problems have arisen.

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Recently, an issue developed in OU5 when an environmental sample exceeding the 2000 picocurie (pCi)/sample-Department of Transportation (DOT)-regulation was sent offsite for analysis. Field Operations Management suspended intrusive activities until a cure notice was prepared. Notice preparation took three days. However, no intrusive activities were scheduled during the interim, so there was no lost time. A critique was held and the root cause of the problem was determined to be that the approved SOPs (FO13 & FO18) being used at the time referenced an SOP (FO25) that hadn't been written. SOP FO25 is in development now.

Currently there are no additional instances where SOPs pending approval have caused or will cause a delay in the future.

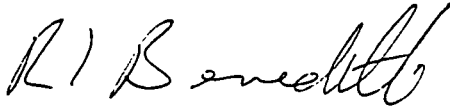
We recognize the shortcomings of the present SOP/Procedure approval system. T. D. Schmidt of my staff has been meeting with R. J. Schassburger (DOE/RFO) to address these issues. A revised format for Document Control Notices (DCNs) is being instituted called a Document Modification Request (DMR). The new form will require DOE approval via signature on the cover sheet. It will further require the initiator of the procedure to address impacts to scope, cost and schedule. In addition, we are revising the Operational Readiness Review Procedure to assure that all of the requirements to begin field work are in place. This not only assures that the required SOPs have been developed, it also assures that the proper training has taken place and the quality addendum for each of the work plans is complete and ready for implementation.

However, we request clarification in two areas:

- (1) Under the Interagency Agreement (IAG) and our Quality Assurance Project Plan (QAPjP), DOE/RFO, EPA and CDH approval of a procedure is required to begin work. Since we are a contractor to DOE, we believe the minimum approval prior to work initiation should be approval from EG&G Rocky Flats and DOE/RFO. DOE approval is required to assure there are no Management & Operating Contractor (M&O) accountability problems. Agency approval is required to insure that the results of the work will be accepted by them. We would appreciate prior guidance in this area for both SOP's and Technical Memoranda. If this approach is selectively used with senior management approval, significant time can be saved with a minimal risk of rejection of work performed.
- (2) To complete our administrative records for the operable units, documentation of agency approval of all documents such as SOPs and Technical Memoranda is required. These records have not always been requested or received from the agencies. We request that DOE/RFO request written approvals and transmit these records to us.

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We will continue to work with DOE to ensure that our work is accomplished within a framework of approved procedures which provide a high degree of quality assurance and accountability.

A handwritten signature in cursive script, appearing to read "R. L. Benedetti".

R. L. Benedetti  
Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.

MFM:dql

Orig. and 1 cc - J. K. Hartman

Enclosures:  
As Stated

The development and incorporation of SOPs for Vertical Soil Profiles, Collection of Surficial Soil Samples Below Paved Areas, Asphalt Sampling, and Collection of Wipe and Pavement Samples for PCB's is complete. A draft of the revised SOP GT.08 is enclosed for your consideration. This procedure is consistent with the methods presented in Collection of Surficial Soil Samples Technical Memorandum No. 5 for OU1 and in Tech Memo #4 for OU5. Approval of these Technical Memoranda by the agencies constitutes an approved procedure. Both of these Technical Memoranda have received approval from the regulatory agencies.

The development of an SOP for the Collection of Surficial Soils (Root Zone) for Use in the Ecological Risk Assessment Process will occur under the provisions of the Scientific Notebook SOP-3-21000 ADM-5.10 which allows for the systematic development of a complex scientific investigation or sampling method as it is needed for the particular investigation. Details of this process are presented in an memo from Dr. Mark Bakeman to M.F. McHugh dated April 8, 1993. A copy of the memo is provided.

The draft SOP for Steam Rinsate Sampling for Characterization in OU15 has already completed and forwarded to DOE on April 26, 1993, by the OU15 Project Manager D. L. Schubbe. A copy is enclosed with this transmittal for your convenience.

The requirement to produce an SOP for Soil Coring from Five Foot Depth to Confirm Soil Gas Surveys no longer exists. The requirement first appeared in the OU5 work plan but was deleted in Technical Memorandum #5 on Soil Gas Investigations for OU5 because it was not required. That Technical Memorandum has been approved by the agencies.

The methods that would appear in an SOP titled Use of Colorimetric Techniques to Determine Concentrations of Inorganic Parameters in Water are already included in the Groundwater SOPs, specifically as GW.05 Field Measurement of Groundwater Field Parameters. At this time there doesn't appear to be additional requirements SOP development in this area.

Included in this transmittal is the Draft SOP for Laboratory Application of the HPGe. T. Szydlowski of the 123 Laboratory has drafted this procedure and it is currently being reviewed internally.

The last Draft SOP incorporates all of the Tank and Pipeline procedure requirements into one procedure. Sections include:

- Tank/Pipeline Inspection
- Tank/Pipeline Testing
- Tank/Pipeline Residue Sampling
- Video Inspection of Pipelines

One section of this procedure, Video Inspection of Pipelines has already been approved for use in OU5 by CDH.